

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re REFCO INC. SECURITIES LITIGATION	:
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	Case No. 07-MD-1902 (JSR)

This Document Relates to:

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KENNETH M. KRYS, et al.,	:
	:
Plaintiffs,	:
	:
-v-	:
	:
CHRISTOPHER SUGRUE, et al.,	:
	:
Defendants.	:
	:

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KENNETH M. KRYS, et al.,	:
	:
Plaintiffs,	:
	:
-v-	:
	:
DEUTSCHE BANK SECURITIES INC., et al.,	:
	:
Defendants.	:
	:

**DECLARATION OF LINDA T. COBERLY
IN SUPPORT OF THE GRANT THORNTON DEFENDANTS' RESPONSE
TO PLAINTIFFS' RULE 56.1 STATEMENT**

Linda T. Coberly, under penalty of perjury, hereby declares as follows:

1. I am an attorney with Winston & Strawn LLP and counsel for Grant Thornton LLP and Mark Ramler in the above-captioned action. I am admitted to practice before the courts of the State of Illinois, and I am admitted to practice *pro hac vice* in this action pending before the United States District Court for the Southern District of New York.

2. I am familiar with the facts and circumstances stated herein and respectfully submit this declaration in support of the response by Grant Thornton LLP and Mark Ramler (collectively the “Grant Thornton Defendants”) to Plaintiffs’ Motion for Partial Summary Judgment on the Issue of the Primary Violation of Fraud by Refco.

3. Attached hereto as Exhibit 1 is a true and correct copy of Deposition Exhibit 672, Refco’s October 10, 2005 press release.

4. Attached hereto as Exhibit 2 is a true and correct copy of excerpts of the transcript of the December 10, 2009 deposition of Robert Trosten.

5. Attached hereto as Exhibit 3 is a true and correct copy of Deposition Exhibit 2808, the plea allocution of Robert Trosten, dated February 20, 2008.

6. Attached hereto as Exhibit 4 is a true and correct copy of the Indictment of Phillip R. Bennett, Robert C. Trosten, and Tone N. Grant.

7. Attached hereto as Exhibit 5 is a true and correct copy of the plea allocution of Phillip Bennett, dated February 15, 2008.

8. Attached hereto as Exhibit 6 is a true and correct copy of excerpts of the transcript of the December 14, 2009 and December 15, 2009 deposition of Santo Maggio.

9. Attached hereto as Exhibit 7 is a true and correct copy of Deposition Exhibit 2871, the plea allocation of Santo Maggio, dated December 19, 2007.

10. Attached hereto as Exhibit 8 is a true and correct copy of the Indictment of Santo Maggio.

11. Attached hereto as Exhibit 9 is a true and correct copy of excerpts of the transcript of the September 14, 2012 hearing before Special Master Daniel J. Capra.

Dated: January 22, 2013

WINSTON & STRAWN LLP

By: /s/
Linda T. Coberly

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*Attorneys for Defendants Grant Thornton
LLP and Mark Ramler*